



Elizabeth Mazur &lt;elizabethm@loevy.com&gt;

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**RE: Stepney**

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**Susan Sullivan** <ssullivan@smbtrials.com>

Thu, Jan 22, 2009 at 12:21 PM

To: Elizabeth Mazur &lt;ElizabethM@loevy.com&gt;, Russell Ainsworth &lt;russell@loevy.com&gt;

Cc: Art Reliford &lt;areliford@smbtrials.com&gt;, Leslie Hardy &lt;lhardy@smbtrials.com&gt;, Mary Cameron &lt;mcameron@smbtrials.com&gt;

Dear Liz and Russell,

I am still working on gathering the documents, but will have them to you today. The PTD records also arrived and I have been working out deposition dates with the officers. The officers are also gathering their personal cell phone records for the August 27, 2008 so that I can produce them to you as instructed by Judge Zagel. I will hopefully be contacting you today with firm dates to produce them next week.

Please let me know if you have been able to confirm dates when Plaintiffs are available to be deposed. In our conversation on Tuesday, I meant to confirm with you whether you will be producing Robert and Jeffy Stepney for deposition, or any of the other witnesses disclosed by Plaintiffs. Please let me know at your earliest convenience so that I can set firm deposition dates.

I have also requested several times that you respond to the request to dismiss Sergeant Gabriel Flores from this matter with prejudice. He has answered written discovery and been deposed. Based upon the evidence in this matter, I do not believe that Plaintiffs have any good faith basis to pursue any claim against him. Please indicate, one way or another, if you will dismiss Sergeant Flores.

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-----Original Message-----

**From:** Susan Sullivan**Sent:** Friday, January 16, 2009 3:01 PM**To:** 'Elizabeth Mazur'; Russell Ainsworth**Cc:** Art Reliford; Leslie Hardy; Mary Cameron**Subject:** RE: Stepney

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**EXHIBIT****D**

**LOEVY & LOEVY**  
A CIVIL RIGHTS LAW FIRM

Elizabeth Mazur <elizabethm@loevy.com>

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## RE: Stepney

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Elizabeth Mazur <ElizabethM@loevy.com>

Thu, Jan 22, 2009 at 12:30 PM

To: Susan Sullivan <ssullivan@smbtrials.com>, Russell Ainsworth <russell@loevy.com>

Cc: Art Reliford <areliford@smbtrials.com>, Leslie Hardy <lhardy@smbtrials.com>, Mary Cameron <mcameron@smbtrials.com>

Hi Susan,

I will be working with the Stepneys to coordinate depositions. I will get dates and find out about Robert and Jefty and let you know as soon as possible. I believe you might have mentioned it on the phone, but can you remind me whether there are certain Plaintiffs you want to depose first? Also, should we schedule just one per day, or more than one?

Thanks,  
Liz

----- Original Message -----

**From:** Susan Sullivan

**To:** 'Elizabeth Mazur' ; 'Russell Ainsworth'

**Cc:** Art Reliford ; Leslie Hardy ; Mary Cameron

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**LOEVY & LOEVY**  
A CIVIL RIGHTS LAW FIRM

Elizabeth Mazur <elizabethm@loevy.com>

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## RE: Stepney

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Elizabeth Mazur <ElizabethM@loevy.com>

Mon, Jan 26, 2009 at 11:31 AM

To: Susan Sullivan <ssullivan@smbtrials.com>, Russell Ainsworth <russell@loevy.com>

Cc: Art Reliford <areliford@smbtrials.com>, Leslie Hardy <lhardy@smbtrials.com>, Mary Cameron <mcameron@smbtrials.com>, Susan Sullivan <ssullivan@smbtrials.com>

Hi Susan,

Thank you for the documents. Sorry if no one got back to you about Sunday, but we will keep an eye out for the CRs.

As for Defendants' discovery, we should have Plaintiffs' responses to written discovery to you by 1/30. Regarding the depositions, we can do Cynthia on 2/10, 2/11, or 2/12, and Dorian on 2/13 or 2/20. Tristan can be available any day during the week of 2/16. One we have these three set, I'll get dates for the remaining Plaintiffs. We should be able to produce Jefty, Robert, and the other witnesses in our Rule 26(a) disclosure (with the exception of Brittany Jones, who we understand has moved to California) without the necessity of a subpoena.

Thanks,  
Liz

----- Original Message -----

**From:** Susan Sullivan

**To:** 'Elizabeth Mazur' ; 'Russell Ainsworth'

**Cc:** Art Reliford ; Leslie Hardy ; Mary Cameron ; Susan Sullivan

**Sent:** Friday, January 23, 2009 3:59 PM

**Subject:** RE: Stepney

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